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From: "Ron" <ron@tulsaconnect.com>
To: <wvogl@samhsa.gov>
Date: 7/12/04 2:02AM
Subject: Public Comments on FR DOCKET 04-7984, Mandatory Guidelines

In reviewing many of the public comments on the proposed SAMHSA drug testing guidelines, most of them seem to focus on technical aspects of testing, which I'm sure is important from a scientific standpoint.

My problem and concern is a very human, and real one - I suffer from paruresis (shy bladder syndrome) and cannot produce a urine sample on demand for drug testing. I am fortunate to work at a company that does not presently conduct random drug tests, but I have suffered from the embarrassment and inability to produce a urine sample in the past. Even though I've always been drug-free, I remember the daily worry of being subjected to a random test and knowing I would have to urinate on demand. I know that my situation is not unique, as I've participated in workshops and support groups to help overcome my paruresis. I've heard "horror stories" from other guys who were denied employment or fired for their inability to produce a urine sample for drug testing. Present literature suggests that about 7% of the population suffers from some degree of shy bladder syndrome. As most people with shy bladder are embarrassed, and consequently suffer in silence, the real incidence of this disorder and it's traumatic impact are not understood by most people, including those involved in administration of drug tests.

I am in favor of a safe, drug-free workplace and applaud efforts by government and industry to promote such an environment, since I benefit from it. I believe that drug testing - in some form - is necessary for certain jobs.

I believe that current SAMHSA rules requiring urine tests are unfair and should be replaced with rules allowing, even requiring, use of alternative tests - saliva, blood, sweat, or hair - for those employees that request it. The rules that are adopted by SAMSHA will have significant influence on private industry, so your inclusion of alternative tests is crucial.

Thanks for your consideration.

Sincerely,

Ron
Tulsa, Oklahoma